



Fw: Hilcorp NPDES Questions - DRAFT RESPONSE

Richard Cool to: Cindi Godsey

07/31/2012 01:21 PM

History:

This message has been replied to.

CINDI: LET ME KNOW IF ANY EDITS OR QUESTIONS .

Hi Kate & Linda:

This email confirms my earlier telephone call today with Kate .

This email is in response to Linda's original July 13 inquiry that was supplemented with her July 27 email (both attached below) and reflects deliberations with Cindi Godsey , NPDES Permits Unit.

In summary, Hilcorp proposes to install an additional overboard point for discharges under the Cook Inlet general permit's Discharge No. 014, waterflooding discharges. In addition, Hilcorp indicates there are no other associated process changes and no new or changed pollutants or pollutant constituents .

Based on the submitted information, no permit modification is needed for this proposal and nothing further is needed at this time. At its discretion, Hilcorp can proceed with the installation as proposed .

We hope this is responsive to your inquiry . Please feel free to contact Cindi at (907) 271-6561 or me if you have any other questions.

We appreciate your cooperation and the previous responses to our questions .

Rick Cool
NPDES Compliance Unit
US EPA Region 10
1200 Sixth Avenue, Suite 900, OCE-133
Seattle, WA 98101

Phone: (206) 553-6223
Fax: (206) 553-1280

----- Forwarded by Richard Cool/R10/USEPA/US on 07/31/2012 12:53 PM -----

From: Linda Ward <lward@hilcorp.com>
To: Richard Cool/R10/USEPA/US@EPA,
Cc: Cindi Godsey/R10/USEPA/US@EPA, Kate Kaufman <kkaufman@hilcorp.com>
Date: 07/27/2012 10:37 AM
Subject: RE: Hilcorp NPDES Questions

Rick and Cindi,

Our engineering department has decided they would like to add an additional overboard point. So, we have answered Rick's questions below. Please let us know if this is an option we can pursue, thank you.

1. This overboard point will supplement the existing Waterflood Process Water discharges (Discharge Number 014 on NPDES Permit Drawing L-F-0006). The location will be near OB-10, West side of Leg #3 on the same drawing. See attached drawing with proposed location. The approximate quantity for

discharge would be 10,000 bbl/day.

2. Discharge is Waterflood Process Water, Discharge Number 014.
3. There are no other associated waterflood system process changes. The system will run at normal operating capacity, overboarding the quantity of filtered seawater that would normally be injected in the injection well that is inoperable. The effluent from the sewage treatment system will continue to be injected in the operational water injection well. The location of the take-off from the water injection header will prohibit the effluent from being discharged to the inlet.
4. This would be same Waterflood Process Water.
5. No other fluids would be commingled through this point.

I have also Cc'd Kate Kaufman as I am on vacation 31st -8th and she will be able to assist with any questions you may have during that time.

Thank You,

Linda Ward
Environmental Coordinator

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From: Richard Cool [<mailto:Cool.Richard@epamail.epa.gov>]
Sent: Monday, July 16, 2012 8:51 AM
To: Linda Ward
Cc: Cindi Godsey
Subject: Re: Hilcorp NPDES Questions

Hi Linda:

Thank you for your inquiry. I will be working with Cindi Godsey, NPDES Permits Unit, to respond to your questions.

Would you please provide some additional details about both situations below.

In regard to No. 1 below (adding temporary overboard point):

- Does this temporary overboard point replace or supplement an existing NPDES-authorized discharge? Details if any would be helpful.
- What is the particular NPDES-authorized discharge description/discharge number that this point would accommodate?
- Any related process changes?
- Any new or changed pollutants or pollutant constituents discharged through this point?
- Any commingling of other discharges through this point?

In regard to No. 2 below (tubulars):

- What is the nature (related process and functions) of the tubulars that were removed?
- What is the typical on-platform cleaning process and how are these tubular washings addressed on board?
- What are the typical pollutant constituents of the on-board washings?

I would appreciate it if you would reply to both me and Cindi. Thank you for your help in clarifying the facts about your request.

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▼ Linda Ward ---07/13/2012 04:27:39 PM---Mr. Cool, I have two questions for your regarding Hilcorp's NPDES Permit:

From: Linda Ward <lward@hilcorp.com>
To: Richard Cool/R10/USEPA/US@EPA,
Date: 07/13/2012 04:27 PM
Subject: Hilcorp NPDES Questions

Mr. Cool,

I have two questions for your regarding Hilcorp's NPDES Permit :

1. We are looking at adding a temporary over board point on the King Salmon platform . If engineer decides to add the piping and over board point what is the process for informing EPA and obtaining approval?
2. We had to clean several tubulars from one of our platforms and room was tight on the platform so we shipped the tubulars to shore for cleaning. Normally the rinse water would go to deck drainage but we now have the water in tanks onshore at a third party contractor location . We would like to ship the oily water back to the platform and discharge as deck drainage . So is it acceptable to place in our deck drains?

Thank You,

Linda Ward

Environmental Coordinator

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Proposed New Discharge Location.pdf